

**TECHNICAL REVIEW DOCUMENT**  
**for**  
**MODIFICATION TO OPERATING PERMIT 95OPAD072**

Metro Wastewater Reclamation District  
Adams County  
Source ID 0010097

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February 14, March 11 & 12, 2001  
Revised March 26, 2001

**I. Purpose:**

This document establishes the decisions made regarding the requested modifications to the Operating Permit for Metro Wastewater Reclamation District. This document provides information describing the type of modification and the changes made to the permit as requested by the source and the changes made due to the Division's analysis. This document is designed for reference during review of the proposed permit by EPA and for future reference by the Division to aid in any additional permit modifications at this facility. The conclusions made in this report are based on the information provided in the original request for modification submitted to the Division on January 30, 2001, comments on the draft permit and technical review document received March 23, 2001 and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised construction permit.

**II. Description of Permit Modification Request/Modification Type**

The Operating Permit for Metro Wastewater was issued on November 1, 2001. After issuance of the operating permit, the Division became aware that there was an underground gasoline storage tank at the facility that should have been permitted. The Division notified Metro Wastewater and they subsequently submitted an application on January 30, 2001 to modify their operating permit to include the gasoline storage tank. Requested emissions for the storage tank are

based on AP-42 emission factors and a requested throughput of 75,000 gallons per year. Requested emissions for this unit are less than 1 ton of VOC. Colorado Regulation No. 3, Part C, Section X.A identifies those modifications that can be processed under the minor permit modification procedures. Specifically, minor permit modifications “do not require a case-by-case determination of an emission limitation or standard” or “are not otherwise required by the Division to be processed as a significant modification” or (Colorado Regulation No. 3, Part C, Section X.A.3 & 6). The Division requires that “any change that causes a significant increase in emissions” be processed as a significant modification (Colorado Regulation No. 3, Part C, Section I.B.36.h.(i)). Since the gasoline storage tank is subject to specific Reg 7 requirements and not to a case-by-case RACT determination and because requested emissions are below significance levels (40 tons/yr of VOC), the Division considers that this modification qualifies as a minor modification.

### **III. Modeling**

This modification involves an increase in requested VOC emissions of less than 1 ton/yr. Modeling is not required for VOC emissions.

### **IV. Discussion of Modifications Made**

In addition to the requested modifications made by the source, the Division used this opportunity to include changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this modification.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments on other permits, to the Metro Wastewater Operating Permit with the source’s requested modifications. These changes are as follows:

#### **Section I - General Activities and Summary**

The language in Condition 1.1 regarding the ozone status of the Denver metro area has been changed. As of January 16, 2001, the Denver metro area is considered non-attainment for ozone.

The reference to the Trigen operating permit for combustion sources was changed from 99OPAD212 to 01OPAD212 in Conditions 1.1 and 1.6. Trigen’s permit application for the combustion sources was not submitted until February 5, 2001 and therefore the permit number should reflect the year in which Trigen’s application was submitted.

### Section III - Permit Shield

Based on comments made by EPA on another permit, the following statement was added after the introductory sentence in Section 1 “[t]his shield does not protect the source from any violations that occurred prior to or at the time of permit issuance” and the following phrase was added to the beginning of the introductory sentence “[b]ased upon the information available to the Division and supplied by the applicant”

Minor language changes were made to the justification for the permit shield (table in Section 1) for PSD requirements. In addition, minor language changes were made to the justifications for the permit shield (table in Section 1) for Reg 7.

### Appendices

Appendix B and C were replaced with the Division’s latest revision of these Appendices.

Corrections were made to the addresses in Appendix D

The Division addressed the source’s requested modifications as follows:

#### **Unit T001: 4,000 Gal Underground Gasoline Storage Tank**

**1. Applicable Requirements -** This storage tank was installed in April 1993. This tank was not included in the original Title V permit application as an insignificant activity and therefore, was not addressed during the original issuance of the operating permit. Following the issuance of the operating permit, the Division became aware that a gasoline storage tank may be located at the facility, that should have had a permit but apparently did not. The Division contacted Metro about the gasoline storage tank and they confirmed that they did have a gasoline storage tank at the facility that should have been permitted. Metro subsequently submitted a permit application to rectify the situation on January 30, 2001.

The APEN submitted for this tank indicates that as a control measure the tank has a Stage I vapor control system and a submerged fill pipe. The Stage I vapor control system is a vapor balance system with employs a hose that returns gasoline vapors displaced from the underground tank to the tank truck cargo compartments being emptied. Therefore, the vapor control system consists of the tanker truck and the piping associated with the underground storage tank.

No construction permit will be issued for this tank, as this permit will be processed as a combined construction/operating permit pursuant to Regulation No. 3, Part A, Section I.B.36.h and Part C, Section III.B.7. All appropriate

applicable requirements will be directly incorporated into the operating permit. The applicable requirements for this unit are as follows:

- Total gasoline dispensed from this unit shall not exceed 75,000 gal/yr (as requested on APEN submitted January 30, 2001)
- Emissions of air pollutants shall not exceed the following limitations (as requested on APEN submitted January 30, 2001):  
VOC 0.2 tons/yr
- All new sources shall utilize controls representing Reasonably Available Control Technology (RACT) (Reg 7, Section II.C.2).

RACT for this unit is the specific requirements identified in Reg 7, which will be included in the operating permit. With those requirements included there is no further need to identify the general RACT requirement in the permit.

- General requirements for maintenance and operation of storage tanks (Reg 7, Section III.A).
- Disposal of VOC compounds - general (Reg 7, Section V.A).

Note the above two requirements are included in the general conditions (Section IV) and therefore will not be specifically identified and addressed in Section II of the permit.

- Disposal of gasoline (Reg 7, Section V.B).
- Requirements for storage of petroleum liquids in tanks less than 40,000 gal (Reg 7, Section VI.B.3).
  - o The owner or operator of storage tanks at a gasoline dispensing facility, which receives and stores petroleum liquid, shall not allow the transfer of petroleum liquid from any delivery vessel into any tank unless the tank is equipped with a submerged fill pipe and the vapors displaced from the storage tank during filling are processed by a vapor control system (Reg 7, Section VI.B.3.b)
  - o Tanks equipped with a submerged fill pipe shall meet the specifications of Appendix A (Reg 7, Section VI.B.3.c)
  - o The vapor control system shall include a vapor-tight line from the storage tank to delivery vessel (i.e. an approved control system) (Reg 7, Section VI.B.3.d.(i)).
  - o The owner or operator shall ensure that operating procedures are used so that gasoline cannot be transferred into the tank unless the vapor control system is in use (Reg 7, Section VI.B.3.e).

Note that as previously discussed, the vapor control system is essentially the tanker truck (vapor balance system), the following requirements in Reg 7, Section VI.B.3 will not be included in the operating permit as they apply to the tanker truck/vapor control system.

- o approved vapor balance system (Reg 7, Section VI.B.3.b.(iii))
- o vapor balance system specifications (Reg 7, Section VI.B.3.f)
- o vapor balance system and vapor control system shall meet the requirements of Section XV (Reg 7, Section VI.B.3.g)
- o control device testing and recordkeeping requirements (Reg 7, Section VI.B.3.h & I)

Note that by having the tank filled by a certified tanker truck (i.e. a tanker truck meeting the requirements in Reg 7, Section VI.D), the storage tank is being operated in compliance with the above requirements.

In addition, the requirements in Reg 7, Section XV, "Control of VOC Leaks from Vapor Collection Systems and Vapor Control Systems Located at Gasoline Terminals, Gasoline Bulk Plants, and Gasoline Dispensing Facilities" will not be included in the permit as the requirements apply to the operator of a vapor collection or vapor control system, which is the tanker truck. These requirement do not apply to the transfer of gasoline from the tank to a motor vehicle fuel tank, which are operations Metro Wastewater performs.

**2. Emission Factors** - Approval of emission factors is necessary in order to monitor compliance with the emission limits. The source's requested emissions are based on emission factors from AP-42, Section 5.2 (dated January 1995), Table 5.2-7 as follows:

Filling underground tank (Stage I) – balanced submerged filling	0.3 lbs/10 <sup>3</sup> gal
Underground tank breathing and emptying	1.0 lbs/10 <sup>3</sup> gal
Vehicle refueling operations (Stage II) – uncontrolled displacement losses	11 lbs/10 <sup>3</sup> gal
Vehicle refueling operations (Stage II) – spillage	0.7 lbs/10 <sup>3</sup> gal
Total	13 lbs/10 <sup>3</sup> gal

**3. Monitoring Requirements** – Periodic monitoring for this unit shall include monthly monitoring and recording of the quantity of fuel dispensed. Since the permitted emissions from this tank are based on the requested fuel consumption rate and the emission factor, no emission calculations will be required to monitor compliance with the emission limitations. In the absence of credible evidence to the contrary, compliance with the emission limitation shall be presumed if the fuel consumption limit is not exceeded. In addition, Metro shall be required to certify annually that this tank is only filled by certified tanker trucks and that the remaining Reg 7 requirements are being met (i.e. VOC disposal, submerged pipe specifications, etc.).

**4. Compliance Status** - As indicated previously, after issuance of the Operating Permit, the Division discovered that Metro had a gasoline storage tank on site that required a permit, but did not apparently have a permit. Metro confirmed the existence of the tank and subsequently submitted an application to modify their Operating Permit to include this tank. No construction permit was

issued for this tank, however, the appropriate applicable requirements were directly incorporated into the Operating Permit as a combined construction/operating permit as allowed by Colorado Regulation No. 3, Part C, Section III.B.7.